



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

@ 12/05/02

Reply To
Attn Of: OW-137

Michael T. Ollivant, Project Manager
Parametrix, Inc.
P.O. Box 460
Sumner, WA 98390-1516

Re: Review of the QAPP and SAP, Quil Ceda Village Treated Effluent Infiltration System Inventory and Assessment for Rule Authorization

Dear Mr. Ollivant:

We have completed review of the draft Quality Assurance Project Plan and Site Analysis Plan for the Inventory Assessment for Rule Authorization of Underground Injection Control Facility - *Quil Ceda Village Treated Effluent Infiltration System*. The attached memorandum identifies several minor specific concerns. Please make the changes in the attachment and resubmit the Plans.

If you have questions please contact Thor Cutler at (206) 553-1673. We appreciate your efforts.

Sincerely,

Tim Hamlin, Manager
Ground Water Protection Unit

Attachments (1)

cc: Herman A. Williams, Jr., Chairman, Tulalip Tribes of Washington

bcc: Thor Cutler
Robin Slate

HERMAN W. WILLIAMS, JR.
CHAIRMAN
Tulalip Tribes of
WASHINGTON
6700 Totem Beach Rd
Marysville, WA
98270-9694



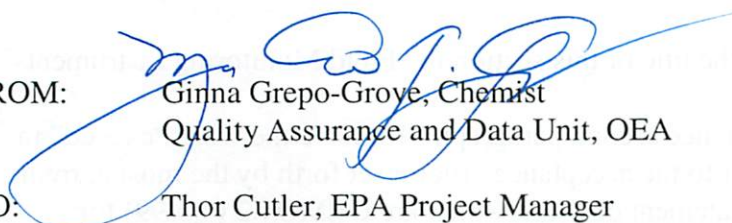
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

Reply To
Attn Of: MGREPOGR
OEA-095

December 4, 2002

MEMORANDUM

SUBJECT: Review of the Quality Assurance Project Plan (QAPP) and Sampling and Analysis Plan (SAP) Inventory and Assessment for Rule Authorization of Underground Injection Control Facility - Quil Ceda Village Treatment Infiltration System
Tulalip Tribes, WA Revision: 7/02

FROM:  Ginna Grepo-Grove, Chemist
Quality Assurance and Data Unit, OEA

TO: Thor Cutler, EPA Project Manager
Groundwater Protection Unit, Office of Water

The review of the above referenced documents has been completed. The QAPP and SAP were prepared by Parametrix for the Tulalip Tribes, Tulalip Washington. The QAPP was prepared according to the Agency EPA QA/R-5 format, "EPA Requirements for Quality Assurance Project Plans", Final: March, 2001". In general, the reviewer found that the QAPP and SAP are very well written and informative. A conditional approval to proceed with the monitoring as scheduled is hereby recommended. A final approval will be recommended after the Tribe address the following concerns:

- ▶ Identify the names of the signatories in the Approval page. The EPA Project Manager for this project is Mr. Thor Cutler. Include the EPA Quality Assurance Officer to the approval signatories. The QA Officer for this project is Ginna Grepo-Grove phone number is (206) 553-1632.
- ▶ Table 2-1 - (1) change the preservation of fecal coliform - Cool, 4C and 0.008% $\text{Na}_2\text{S}_2\text{O}_3$ if residual chlorine is present; holding time is 6 hours; (2) Preservation of Ammonia (TKN) add 4C (3) preservation of cyanide - NaOH to pH>12 Cool 4C.
- ▶ Table 2-2 - Based on the (1) Change analytical method of cyanide to 335.2/335.3; (2) Change the MCLs for the following compounds: 1,1-dichloroethene to 0.007

mg/L; cis-1,2-dichloroethene to 0.07 mg/L; EDB to 0.00005 mg/L (3) Note in the table that the MCL for xylenes is for total xylene.

- ▶ Section 2.5.2.1 - Method Blanks is not spiked with all reagents prior to processing and analysis. Method blanks is spiked with surrogate compounds prior to processing and analysis.
- ▶ Section 2.6.1 - Monitoring Instruments - Please make it clear that this section applies to field monitoring instruments only. State that the frequency and procedure for preventive and regular instrument/equipment maintenance will be performed by the Project Coordinator in accordance with the manufacturer's specifications and the procedures specified by the method.
- ▶ Section 2.6.2 , remove the last sentence first paragraph of this section. To ensure that data of known and needed quality will be generated, it is highly advisable the laboratory analysts who will perform the analysis for this project must be very experienced in the field of instrumentation, analytical methods, data reduction and data interpretation.
- ▶ Section 2.7.1 - Change the title of this section to "Field Monitoring Instruments".
- ▶ Section 2.7.2 - First sentence second paragraph - Remove the word "exceed" in the sentence. Also, refer to the acceptance criteria set forth by the most current revision of EPA CLP Statement of Work which are OLMO4.2 (05/99) for organic analyses and ILM05.2 (12/01) for inorganic analyses.
- ▶ Section 3.1.2 bullet number 3 - for consistency with section 2.7.2 , remove SW846 (1986) in this sentence, calibration check compounds must be within the performance criteria specified in the most current revision of EPA CLP Statement of Work which are OLMO4.2 (05/99) for organic analyses and ILM05.2 (12/01) for inorganic analyses.
- ▶ Section 4.1 second paragraph first sentence. For consistency, the project control limits for precision and accuracy will be based on the specified methods or the current revision of EPA CLP Statement of Work which are OLMO4.2 (05/99) for organic analyses and ILM05.2 (12/01) for inorganic analyses.

Paragraph three third sentence. Change the sentence to "Data validations will be performed in accordance with the technical specifications of the analytical methods and the National Functional Guidance for Organic and Inorganic Data Review (1999, 1994)

Paragraph four , first sentence. Add this to the sentence: "Verification of accuracy

and precision will also be determined by evaluating surrogate recoveries, matrix spike and matrix spike recoveries and relative percent differences(RPDs), QC check recoveries, LCS recoveries, serial dilution results and triplicate results” (conventionals).

If you have any question regarding this review, please call me at (206) 553-1632.

Thor -
see the
changes Tim
made on
all 3 letters.

Lyn

Thor -
Please proof
and return
to me.
Thanks,

Thomas J. Ryan

Good to go Thor.
- Pls copy for file.

John

See
Email

from
J. Boer

Here is letter
draft &
Attachments

Please finalize
~~at~~



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Dear Mr. Ollivant:

We have completed review
The review of the draft Quality Assurance Project Plan (QAPP) and Site Analysis Plan (SAP) for the Inventory Assessment for Rule Authorization of Underground Injection Control Facility - *Quil Ceda Village Treated Effluent Infiltration System* is completed. *Please see the attached memorandum identifying several minor specific concerns, review the comments and resubmit the QAPP and SAP to the Environmental Protection Agency (EPA) for final approval.* *Plans*

If you have Questions related to the project may be directed to Thor Cutler, a member of my staff. *please contact* He can be reached at (206) 553-1673. Thank you for your *continued efforts.* *We appreciate your efforts*

Sincerely,

Tim Hamlin, Manager
Ground Water Protection Unit

Attachments (1)

cc: Herman A. Williams, Jr., Chairman, Tulalip Tribes of Washington

bcc: *Thor Cutler*
Robert Clark